

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE:

OLGA ISABEL RIVERA COLON

DEBTOR

CASE NO. 16-03444-ESL

CHAPTER 13

**DEBTOR'S REPLY TO *MOTION TO DISMISS*, DOCKET #23**

**TO THE HONORABLE COURT:**

**COMES NOW, OLGA ISABEL RIVERA COLON**, debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 21, 2016, Money Express filed a *Motion to Dismiss* (docket #23) basically alleging that the debtor has defaulted in her Chapter 13 Payment Plan in the amount of \$600.00.

2. The debtor met with the undersigned attorney regarding this matter and respectfully submits that she did incur in Plan payment arrears due to certain economic problems.

3. The debtor respectfully submits that on this same date January 18, 2017, she made one (1) \$300.00 e-payment (confirmation no. 208511338) to the Trustee and also filed a post-confirmation modification of Chapter 13 Plan (docket #25) in order to cure any and all Plan arrears owed to the Trustee.

**WHEREFORE**, debtor respectfully requests this Honorable Court deny the motion to dismiss (docket #23) in the above captioned case.

**I CERTIFY** that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of the same to the Chapter 13

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Trustee, I also certify that a copy of this motion was sent via US Mail to the debtor to her address of record.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 18<sup>th</sup> day of January, 2017.

*/s/ Roberto A. Figueroa Colón*  
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